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April 8, 2020

Via ECF

Hon. Sarah L. Cave United States Magistrate Judge United States Courthouse for the SDNY 500 Pearl Street New York, NY 10007

Re: <u>Tineo v. Saul</u> 19 Civ. 9273 (VSB)(SLC)

Dear Judge Cave:

I am writing to request an extension of time in which to file plaintiff's Motion for Judgment on the Pleadings. Plaintiff's papers are due to be filed today. This is plaintiff's second request for an extension of time.

I seek additional time to complete these papers as my schedule has been significantly disrupted on account of COVID 19. We are focused on taking proper care of my elderly mother and worried about my uncle and aunt, who were both admitted to the hospital early this week with COVID 19. My pace and production are significantly delayed and I am not able to complete these papers today. I apologize for not seeking this extension on Monday but I had hopes to make more headway than I was able to do so.

With the kind consent of opposing counsel, AUSAMary Ellen Brennan, I respectfully request that the Court endorse the following revised schedule:

April 15, 2020 Plaintiff's Motion for Judgment on the pleadings

June 15, 2020 Defendant's Opposition/Cross-Motion

July 6, 2020 Plaintiff's Reply

Thank you for Your Honor's attention to this matter.

Very truly yours,

/s/ Christopher J. Bowes Christopher J. Bowes, Esq

cc: Mary Ellen Brennan, Esq. Attorney for Defendant

David Kuznicki, Esq. Attorney for PLaintiff

Plaintiff's Letter-Motion for an extension of time to file a motion for judgment on the pleadings (ECF No. 14) is GRANTED. The parties' briefing schedule is amended as set forth above. The Clerk of Court is respectfully directed to close ECF No. 14.

SO-ORDERD 4/9/2020

SARAH L. CAVE United States Magistrate Judge